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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92057980
Party	Defendant Zitro IP S.AR.L.
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Date	12/08/2014
Attachments	InitialDisclosures.pdf(38136 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Boyd Gaming Corporation,	:	
Petitioner	:	Cancellation No. 92057980
v.	:	Registration No. 3812473
Zitro IP, S.ar.l.,	:	Trademark: POWERMANIA BINGO
Registrant	:	

REGISTRANT'S INITIAL DISCLOSURES

Zitro IP, S.ar.l. ("Registrant"), by and through its attorneys, hereby submits its initial disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure.

1. Names, addresses, and telephone numbers of individuals likely to have discoverable information under Rule 26(a)(1)(A)(i):

Sam Basile, 2777 Borthwick Ave., Henderson, Nevada. Tele. 702-610-3386.

Subject of information: information related to use of the mark POWERMANIA BINGO in U.S. commerce.

Alexander Havernick, Magic City Casino, 401 NW 38th Court, Miami, Florida 33126.

Subject of information: information related to use of the mark POWERMANIA BINGO in U.S. commerce.

Albert Muro, Canela Patentes y Marcas, Girona 148, 1-2, 08037 Barcelona, Spain.
Tele. 011-34 93 459 1368.

Subject of information: information related to the company Zitro IP S.ar.l., including identity of individuals having information related to intent to use the mark in commerce, and to actual use of the mark in U.S. commerce.

2. Copies, or description by category and location of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control that may be used to support its claims or defenses under Rule 26(a)(1)(A)(ii):

A copy of an affidavit by Mr. Havernick, above, relating to use of the mark in the U.S., is maintained on the undersigned's server.

Other documents, electronically stored information, and tangible things relative to Zitro's intent to use the mark and actual use of the mark may be maintained at Zitro's offices, offsite storage facilities, and/or computer servers and/or at the office of Albert Muro, above.

3. Other information

Registrant has applied to register the mark "POWER BINGO", appln. No. 29/143422.

The disclosures made herein are based on information currently known or available to the undersigned after a reasonable inquiry. There may be information that Registrant does not yet know of or has not yet located, identified or reviewed. Registrant therefore reserves its right to supplement or amend these initial disclosures.

Respectfully submitted,

/Charles Fallow/

Charles W. Fallow, Attorney for Registrant

Shoemaker and Mattare, Ltd.
10 Post Office Road - Suite 100
Silver Spring, Maryland 20910

December 8, 2014

CERTIFICATE OF SERVICE

I certify that the above Initial Disclosures was served upon Petitioner's attorneys

Brownstein Hyatt Farber Schreck, LLP
100 North City Parkway, Suite 1600
Las Vegas, Nevada 89106-4614

this 8th day of December, 2014 by email addressed to lvpto@bhfs.com,
kgoldberg@bhfs.com, jobermeyer@bhfs.com, elewis@bhfs.com, lbielinski@bhfs.com

/Charles Fallow/